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12 *Attorney for Defendants*

13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF WASHINGTON

15 BRIAN TACKETT,

16
17 Plaintiff,

18 vs.

19 PROVIDENCE SACRED HEART
20 MEDICAL CENTER, KAVITHA
21 CHAGANUR, MD,

22 Defendants.
23

Cause No. 2:24-cv-00262

JOINT STATUS REPORT
PURSUANT TO FRCP 26(f)

24
25 In accordance with Fed. R. Civ. P. 26(f)(2), Plaintiff, pro se, and
26 Defendants, by and through their counsel of record, certify that they conferred in
27
28 good faith about the following and present this Joint Status Report.
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30

1 **1. Service.**

2 Service upon all Defendants is complete.

3
4 **2. Jurisdiction, Venue, and Standing.**

5 Jurisdiction, venue, and standing are proper.

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7 **3. No Consent to Magistrate.**

8 The parties do not consent to an assignment of this case to be tried before
9
10 a magistrate judge.

11 **4. Statement of Nature and Basis of Case.**

12 This is a medical malpractice wrongful death case. Plaintiff alleges that
13
14 Defendants negligently failed to diagnose and treat decedent Robbie Tackett.
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16 Plaintiff alleges Defendants claimed failure to treat and diagnose resulted in
17
18 decedent's death on July 31, 2019.

19 **5. Preferred Trial Date and Estimated Length of Trial.**

20 The parties' preferred trial date is June of 2026. The estimated length of
21
22 trial is 8 court days.

23 **6. Anticipated Motions.**

24 The parties anticipate filing motions for summary judgment as well as
25
26 typical pretrial motions *in limine*.
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1 **7. Arrangement for the disclosures required under Fed. R. Civ. P.**
2 **26(a)(1).**

3 The parties will make their initial disclosures within 14 days after the
4 parties' Rule 26(f) conference. The parties stipulate that initial disclosures of
5 retained expert witnesses and their reports under Rule 26(a)(2)(B) will be
6 provided under the schedule set forth below (Scheduling Order). Documents will
7 be shared electronically using a email or storage disc sent via U.S. Postal Mail,
8 no internet or cloud storage will be used.
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10
11

12 **8. Fed. R. Civ. P. 26(f) Discovery Plan.**

13 As discussed above, the parties will exchange Fed. R. Civ. P. 26(a) initial
14 disclosures within 14 days after their Rule 26(f) conference, which was
15 completed on January 7, 2025. The parties anticipate e-discovery which they
16 believe can be handled through the normal discovery process. The parties have
17 also consulted and propose for the Court's consideration a modified case
18 schedule as set forth below, which they believe will allow this case to be
19 efficiently prepared for trial.
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24 **9. No Class Certification.**

25 No class certification is alleged.
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27 **10.Claim of a Minor or Incompetent Person.**
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29
30

Plaintiff's position: Plaintiff's two minor children, G.K.T. and G.A.T. are unrepresented minors with substantial damage claims in this matter. Plaintiff ("has stipulated") (or "tried to stipulate") with Defendants not to add them as plaintiffs or call them as witnesses in exchange for Defendants' agreement not to depose them or call them as witnesses in this case. However, Plaintiff and Defendants do not have the last say in this and it is for this Court to consider the stipulation for fairness to the rights of these unrepresented minors. Should this Honorable Court decide to include these minors and their claims in this action and assign them counsel, Plaintiff and Defendants are not bound by this stipulation."

11.Special Procedures.

Plaintiff's position: "If Defendants fail to stipulate not to depose Plaintiff's minor children, or this Court decides to include them as plaintiffs, a special Court supervised proceeding is requested by Plaintiff to depose these minors to prevent psychological harm."

12.Modification of the Standard Procedures.

SCHEDULING ORDER	
Plaintiff's Expert Witness Disclosures	225 days before trial

Defendant's Expert Witness Disclosures	185 days before trial
Rebuttal Expert Disclosures	125 days before trial
Motion to Amend/Add Parties	130 days before trial
Daubert Motions	90 days before trial
Discovery Cutoff	60 days before trial
Dispositive Motions	45 days before trial
Hearing Request Re Deposition Designation	30 days before trial
Cross Designations	20 days before trial
Objections to Designations	14 days before trial
Exhibit/Witness Lists	28 days before trial
Objections Exhibit/Witness Lists	21 days before trial
Response to Exhibit/Witness Objections	14 days before trial
Motions <i>in Limine</i>	35 days before trial
Response to Motions <i>in Limine</i>	28 days before trial
Replies to Motions <i>in Limine</i>	21 days before trial
Pretrial Order	14 days before trial
Trial Briefs, voir dire	14 days before trial
Jury Instructions	14 days before trial

(Agreed/Disputed)	
Memo Object to Disputed Jury Instructions	14 days before trial
Pretrial Conference/Motion <i>in Limine</i> Hearing	10 days before trial

13. Feasibility of bifurcation.

The parties do not believe bifurcation is appropriate or necessary in this case.

14. Alternative Dispute Resolution.

The parties believe that they will be able to evaluate the potential to conduct meaningful settlement discussions after preliminary discovery.

15. Identification of any issues that should be certified to the state Supreme Court.

None anticipated.

16. Any other matters which may be conducive to the just, efficient, and economical determination of the action or proceeding, including the definition or limitation of issues.

None at this time.

1 DATED this ____ day of January, 2025

2 By s/ See Next Page
3 Brian Tackett, *Pro Se Plaintiff*
4 POB 448
5 Troy, Montana 59935
6 Tackett59935@gmail.com

7 **EVANS, CRAVEN & LACKIE, P.S.**

8 By s/ [Signature]
9 Markus W. Louvier, WSBA #39319
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10 conduct meaningful settlement discussions after preliminary discovery.
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12 **15. Identification of any issues that should be certified to the state**
13 **Supreme Court.**

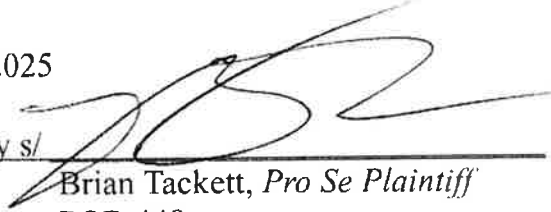
14 None anticipated.

15
16 **16. Any other matters which may be conducive to the just, efficient, and**
17 **economical determination of the action or proceeding, including the**
18 **definition or limitation of issues.**

19 None at this time.
20
21
22
23

24 DATED this 2th day of January, 2025

25
26 By s/

27  Brian Tackett, Pro Se Plaintiff

28 POB 448

29 Troy, Montana 59935

30 Tackett59935@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on January 7th, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

Plaintiff, Pro Se

Brian Tackett

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s/

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